

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

v.

Case No. 15-mj-104

ROBERT SHILTS,

Defendant.

COMPLAINT FOR VIOLATION OF
TITLE 18, UNITED STATES CODE, SECTION 2252(a)(2)

BEFORE United States Magistrate Judge
Stephen L. Crocker

United States District Court
120 North Henry Street
Madison, Wisconsin 53703

The undersigned complainant being duly sworn states:

On or about May 18, 2015, in the Western District of Wisconsin, the defendant,

ROBERT SHILTS,

knowingly distributed visual depictions using any means or facility of interstate or foreign commerce, and the production of such visual depictions involved the use of minors engaging in sexually explicit conduct, and the depictions were of such conduct. Specifically, the defendant used a digital tablet to post the visual depictions into a chatroom of an online messaging application.

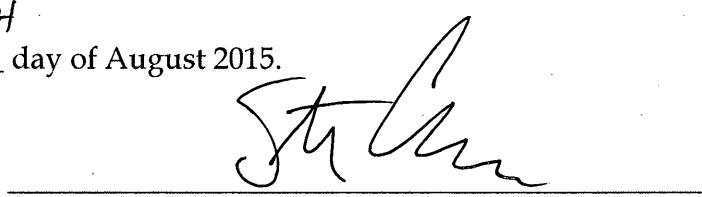
(In violation of Title 18, United States Code, Section 2252(a)(2)).

This complaint is based on the attached affidavit of Special Agent Elizabeth Hanson, Homeland Security Investigations.



ELIZABETH HANSON
Special Agent, Homeland Security Investigations

Sworn to before me this 20th day of August 2015.



STEPHEN L. CROCKER
United States Magistrate Judge

AFFADAVIT

STATE OF WISCONSIN)
) ss.
DANE COUNTY)

I, Elizabeth R. Hanson, being duly sworn, depose and state as follow:

1. I am a Special Agent (SA) with the U.S. Immigration and Customs Enforcement, Homeland Security Investigations (HSI), an investigative branch of the U.S. Department of Homeland Security. I have been employed as a Special Agent with HSI since December 1994 and was previously employed by the U.S. Customs Service for seven years. I am currently assigned to the Office of the Resident Agent in Charge in Milwaukee, Wisconsin. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. During the past ten (10) years, I have investigated criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt and possession of child pornography, in violation of Title 18, United States Code, Sections 2251 and 2252. I have received training in the investigation of child pornography and child exploitation offenses, and have had the opportunity to observe and review numerous examples of electronically-stored child pornography (as defined in 18 U.S.C. § 2256).

2. The information contained in this affidavit is based primarily on my conversations with SA Kevin Wrona. I have also read the search warrant affidavit SA Wrona prepared in this case. As SA Wrona swore to the information in the search warrant affidavit, I believe it to be reliable.

3. Title 18, United States Code, Section 2252(a)(2), prohibits a person from knowingly distributing any visual depiction using any means of interstate or foreign commerce, if such depiction involves the use of minors engaging in sexually explicit conduct and the images are of such conduct.

4. On May 19, 2015, SA Patrick McCall was operating in an undercover capacity and signed into an undercover "Kik" user account in order to conduct child exploitation investigations on the Kik Messenger application. The Kik messenger application is primarily a social media mobile device used for mobile messaging and communication. Once downloaded and installed, the user is prompted to create an account and a username. This username will be the primary account identifier. The user also has a display name, which will be what other users initially see when transmitting messages back and forth. Kik Messenger also allows users to create chat rooms, of up to 50 people, for the purpose of communicating and exchanging images and videos.

5. While using Kik, SA McCall saw that user "young_old_lover290" (display name "Bob Lasko") posted three images in the Kik Messenger chat room "#69babylids69" on May 18, 2015 at approximately 5:06 p.m.¹ SA McCall downloaded and saved these images to an undercover device.

6. The screenshots of the posts made by "Bob Lasko" show the profile picture of "Bob Lasko" followed by three child pornography images. The profile picture was an image of a sports car. The three images posted were the following:

¹ As described below, I believe "Bob Lasko" has been identified as the defendant, Robert Shilts. I will refer to him as "Bob Lasko" in this section of the affidavit as that was the display name on Kik Messenger.

a. A Caucasian prepubescent female with dark hair lying naked on what appears to be a beach lounge chair with her vaginal area exposed.

b. A Caucasian prepubescent female with shoulder-length dark hair sitting naked on what appears to be the corner of a bed. The minor female appears to have fluid or liquid on her lower abdomen and pubic area. The eyes of the child have been digitally blacked out.

c. A Caucasian female, who appears to be a toddler, wearing a pearl necklace holding an erect penis of an adult male in her hand.

7. On May 27, 2015, HSI Wilmington served a Department of Homeland Security (DHS) summons on Kik requesting subscriber and IP address records associated with the user "young_old_lover290" (display name "Bob Lasko").

8. On May 28, 2015, Kik responded to the summons and identified the user subscriber account with the following account information showing that between April 28, 2015 and May 26, 2015, "Bob Lasko" logged into Kik using IP address 67.209.75.125.

9. SA McCall queried the American Registry for Internet Numbers ("ARIN") online database which revealed that IP address 67.209.75.125 was registered to Airstream Communications.

10. On June 4, 2015, HSI Wilmington served a DHS summons on Citizen Telephone Cooperative Incorporated for subscriber records associated with the IP address 67.209.75.125 used to access the Kik Messenger application.

11. On June 4, 2015, Citizen Telephone Cooperative Incorporated responded to the summons and identified the subscriber account to which the target IP address

67.209.75.125 was assigned at the time the images described in paragraph 6 were posted on the Kik Messenger site was assigned to a residence at 227 East Dell Street, New Auburn, Wisconsin 54757.

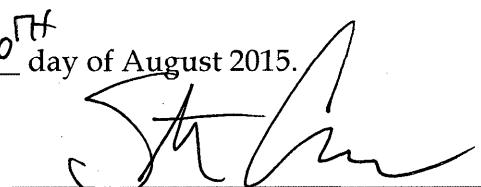
12. On August 20, 2015, I participated in the execution of a search warrant at 227 East Dell Street in New Auburn. Robert Shilts was located at a near-by gas station and agreed to be interviewed.

13. Shilts admitted that he accessed chat rooms through Kik with the user name "young_old_lover290" and the display name "Bob Lasko." He admitted downloading child pornography images from other Kik chatrooms and posting them in the Kik chat room where SA McCall saw them. He said he did this exclusively with a Nook tablet. When asked to define child pornography, he said it was children ages 5 to 8 engaging in sexual activity with adults.



ELIZABETH R. HANSON
Special Agent
Homeland Security Investigations

Sworn to before me this 20TH day of August 2015.



STEPHEN L. CROCKER
United States Magistrate Judge